

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re:

HILAL K. HOMAIDAN fka Helal K. Homaidan

Debtor,

HILAL K. HOMAIDAN on behalf of himself and all
others similarly situated

Plaintiff,

v.

SALLIE MAE, INC, NAVIENT SOLUTIONS, LLC,
NAVIENT CREDIT FINANCE CORPORATION

Defendants.

Chapter 7

Case No. 08-48275 (ESS)

Adv. Pro. No. 17-1085

**REPLY DECLARATION OF GEORGE F. CARPINELLO IN FUTHER SUPPORT OF
PLAINTIFFS' MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION FOR
PARTIAL SUMMARY JUDGMENT AND A PRELIMINARY INJUNCTION**

George F. Carpinello, an attorney at law admitted to practice before the Courts of the State of New York and the Eastern District of New York, declares pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner with the law firm of Boies Schiller Flexner, LLP, attorney for Plaintiffs, and I make this declaration in support of Plaintiffs' Memorandum of Law in Support of Its Motion for Summary Judgment.

2. Attached hereto as Exhibit A is an excerpt of the deposition of Patricia P. Peterson taken on September 19, 2017 ("Peterson I"), pages 232:18 to 235:3.

3. Attached hereto as Exhibit B is document NAV120000006 produced by Defendants in discovery in this action.

4. Attached hereto as Exhibit C is an excerpt of the deposition of Patricia P. Peterson taken on January 12, 2018 ("Peterson II"), pages 488:4 to 489:24.

5. Attached hereto as Exhibit D is document NAV120000004 produced by Defendants in discovery in this action.

6. Attached hereto as Exhibit E is information from the National Center for Education Statistics, IPED's Data Center for Queens College. This information shows that the cost of attendance for the academic year 2006-2007 for an in-state student living off campus with family is \$17,293. For the academic year 2007-2008 it shows that number at \$17,725. Both numbers are arrived at using the highest allowable amount for living expenses off campus.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: February 12, 2020


George F. Carpinello